



No. 217586
Vancouver Registry

In the Supreme Court of British Columbia

Between

Action4Canada, Linda Morken, Gary Morken, Jane Doe, Ilona Zink,
Valerie Ann Foley, Pastor Randy Beatty, Brittany Wilson

Plaintiffs

and

His Majesty the King in right British Columbia, His Majesty the King in right
Canada. Prime Minister Justin Trudeau, Chief Public Health Officer Theresa Tam,
Dr. Bonnie Henry, David Eby, Adrian Dix, Minister of Health, Mike Farnworth,
Minister of Public Safety and Solicitor General Omar Alghabra, Minister of
Transport, Vancouver Island Health Authority, The Royal Canadian Mounted
Police (RCMP), and the Attorney General of Canada, Peter Kwok, TransLink
(British Columbia)

Defendants

NOTICE OF APPLICATION



Names of applicants: His Majesty the King in right British Columbia, Dr. Bonnie
Henry, David Eby, Adrian Dix, Mike Farnworth (collectively, "**British Columbia**")

To: Action4Canada, Linda Morken, Gary Morken, Jane Doe, Ilona Zink,
Valerie Ann Foley, Pastor Randy Beatty, Brittany Wilson (the "**plaintiffs**")

TAKE NOTICE that an application will be made by British Columbia to the
presiding judge or master at the courthouse at 800 Smithe Street, Vancouver, BC
on October 20, 2025, at 9:45 am for the orders set out in Part 1 below.

10:00 am

British Columbia estimates that the application will take 1 day.

This matter is within the jurisdiction of an associate judge.

Part 1: ORDERS SOUGHT

1. An order striking the amended notice of civil claim, pursuant to Rule 9-5(1), without leave to amend.
2. Costs.
3. Such other relief as this Honourable Court deems fit.

Part 2: FACTUAL BASIS

I. Notice of civil claim

4. On August 27, 2021, the plaintiffs filed a 391-page notice of civil claim to challenge the scientific and legal basis for the entirety of British Columbia and Canada's response to the COVID-19 pandemic (the "**original claim**"). In the original claim, the plaintiffs sought hundreds of declarations. The claim made sweeping allegations of conspiracy, sought rulings on questions of science, and alleged criminality in a civil pleading.

II. Notice of civil claim struck

5. On August 29, 2022, Justice A. Ross struck the original claim, with leave to amend. He held that the notice of civil claim was clearly prolix, unanswerable, and "bad beyond argument".¹

6. In *obiter*, Justice A. Ross identified numerous improperly pleaded aspects of the original claim. These included non-justiciable declarations on questions of science, declarations of fact, and purported causes of action arising out of the *Criminal Code* and international law.²

7. Finally, while Justice A. Ross declined to find that the original claim was an abuse of process, he held that "if the next iteration of [the civil claim] contains the same, or similar, problems, then the defendants' arguments on these issues will be strengthened."³

III. Appeal dismissed

8. The plaintiffs' appeal of Justice A. Ross' order was dismissed on February 23, 2024.⁴

9. In oral submissions, the plaintiffs conceded that the claim was prolix.⁵ Notwithstanding this concession—and being "aware of the trite principle that appeals are taken from orders and not reasons"—the plaintiffs nonetheless persisted in their appeal, arguing that Justice A. Ross erred in his *obiter* comments.⁶

10. The Court of Appeal rejected the plaintiffs' position, stating that it "agree[d] entirely with the respondents" and that Justice A. Ross had "transparently and

¹ *Action4Canada v. British Columbia*, 2022 BCSC 1507 [**Action4Canada SC**] at para. 45.

² *Action4Canada SC* at paras. 52-58.

³ *Action4Canada SC* at para. 73.

⁴ *Action4Canada v. British Columbia (Attorney General)*, 2024 BCCA 59 [**Action4Canada CA**].

⁵ *Action4Canada CA* at para. 8.

⁶ *Action4Canada CA* at para. 8.

helpfully identified a number of areas of concern with the notice of civil claim.”⁷ In so doing, Justice A. Ross had provided the plaintiffs “fair warning of the possible consequences” of filing another improper pleading.⁸

IV. Plaintiffs’ counsel advances similar frivolous claims

11. Concurrent to this proceeding, the same plaintiffs’ counsel has advanced similar frivolous claims in Ontario and Federal courts.⁹ In both instances, counsel filed omnibus pleadings challenging government’s approach to the COVID-19 pandemic. These claims were rife with conspiracy theories, non-justiciable causes of action, and offended the basic rules of pleadings.¹⁰ Both pleadings were over 50 pages long, nine pages of which listed the relief sought.¹¹ In the result, both the Ontario and Federal courts relied on Justice A. Ross’ reasoning in *Action4Canada SC*, striking the claims as prolix and “bad beyond argument.”¹²

12. In *Dorceus*, the Ontario Superior Court of Justice criticized the claim, stating:

[53] I have the distinct impression from reading the Amended Claim as a whole that its object is not to vindicate the employment rights of the plaintiffs so much as it is to mount a political crusade in which the court will be used as a grandstand to conduct an inquiry into the effectiveness of vaccines and the effectiveness of government measures in response to the Covid-19 pandemic by opponents of those measures.

13. The Court went on to state that the pleadings were “so outlandish and so far outside the spectrum of what is reasonable that there is no legitimate public interest in its pursuit.”¹³ Moreover, the frivolous nature of the claim ought to “have become clear by the time the British Columbia Supreme Court, British Columbia Court of Appeal, Federal Court, and the Federal Court of Appeal struck out similarly drafted statements of claim prepared by the same lawyer.”¹⁴

V. Amended notice of civil claim

14. On December 12, 2024, the plaintiffs served the amended notice of civil claim (the “**amended claim**”). While the footnotes and some inflammatory and

⁷ *Action4Canada CA* at para. 10.

⁸ *Action4Canada* at para. 11.

⁹ *Adelberg v. Canada*, 2023 FC 252, var’d on other grounds 2024 FCA 106; *Dorceus v. Ontario et al.*, 2024 ONSC 7087.

¹⁰ *Adelberg* at para. 45; *Dorceus* at para. 48.

¹¹ *Adelberg* at para. 45; *Dorceus* at para. 48.

¹² *Adelberg* at para. 52; *Dorceus* at para. 46.

¹³ *Dorceus* at para. 154.

¹⁴ *Dorceus* at para. 154.

conspiratorial language were removed, the claim is 54 pages long and seeks over 50 declarations—including declarations on issues of science, international law, and criminal law. The amended claim is essentially a repackaged version of the original claim and still fails to meet the basic tenets of pleadings.

Part 3: LEGAL BASIS

I. The amended claim must be struck without leave to amend

15. The amended claim must be struck because it discloses no reasonable cause of action (Rule 9-5(1)(a)), it is scandalous, frivolous, and vexatious (Rule 9-5(1)(b)), and is an abuse of process (Rule 9-5(1)(d)).

16. The amended claim is a pleading that cannot be answered. It remains a prolix, unintelligible piece of legal drafting which is replete with non-justiciable claims, fails to plead necessary material facts, and does not conform with the basic tenets of pleadings.

(a) No reasonable cause of action (9-5(1)(a))

17. It is plain and obvious that the amended claim does not present a reasonable cause of action. The amended claim pleads causes of action with no prospect of success, fails to plead material facts, seeks declarations on non-justiciable questions, and pleads causes of action not known to law.

18. First, the amended claim advances numerous legal claims which are unsupported in law and bound to fail, including:

- a. All claims for declaratory relief in respect of administrative orders by the Provincial Health Officer arising out of the Notice of Regional Events s. 52(2) of the *Public Health Act* or the Minister of Public Safety and Solicitor General's declared state of emergency under the *Emergency Act* are moot.¹⁵ The Notice of Regional Event, and thus any remaining public health orders, was rescinded in July 2024. Likewise, the state of emergency expired on June 30, 2021. In the context of public health measures responding to the COVID-19 pandemic, courts have consistently declined to hear moot cases where bare declaratory relief is sought, as "[i]t is better to assess the constitutionality of those measures in the context of a live controversy, based on the factual context at issue."¹⁶
- b. The plaintiffs' challenge to *Bill 36 – Health Profession and Occupation*

¹⁵ British Columbia accepts that the claims for *Charter* damages are not moot: see e.g., *Dorceus* at para. 95.

¹⁶ *Tatlock v. British Columbia (Attorney General)*, 2025 BCCA 181 at para. 32.

Act is premature. This statute is not in force and will not have legal effect until brought into force by the Lieutenant Governor in Council. The claim is therefore “not ripe for adjudication [as] it rests upon contingent future events that may not occur as anticipated, or at all”.¹⁷ Moreover, and in any event, the plaintiffs have improperly sought to add Brittany Wilson as a party via amended claim, rather than an application under Rule 6-2(7).¹⁸ The entirety of the plaintiffs’ challenge to *Bill 36* rests on the asserted facts relating to Ms. Wilson. Since she is not a party, the remaining plaintiffs neither have standing to challenge *Bill 36* nor have they pleaded any material facts with respect to *Bill 36*, in any event.

- c. Much of the declaratory relief relates to the exercise of statutory powers and therefore must be challenged via petition for judicial review.¹⁹ Parties cannot circumvent the *Judicial Review Procedure Act* and ask the court “to simply declare the orders away” via action.²⁰
- d. The plaintiffs seek declarations of constitutional principles which have no basis in law and are bound to fail, including:
 - i. that “vaccination” is an analogous ground under s. 15 of the *Charter*;²¹
 - ii. that the provincial legislature has no jurisdiction to regulate speech or assembly under s. 92 of the *Constitution Act, 1867*;²²
 - iii. that s. 7 of the *Charter* imposes a “duty to consult” before public health measures are adopted;²³
 - iv. that s. 7 of the *Charter* protects the right to practice in a chosen profession;²⁴
 - v. that the provincial *Emergency Act* and orders made by the Provincial Health Officer under the *Public Health Act* are *ultra*

¹⁷ *Weisenburger v. College of Naturopathic Physicians of British Columbia*, 2024 BCSC 1047 at para. 79.

¹⁸ The plaintiffs have also improperly sought to add Premier David Eby as a defendant to this action via amended claim. However, they have not plead any factual or legal allegations in respect of Premier Eby.

¹⁹ Amended claim at para. 97-100, 103, 110, 116-118.

²⁰ *Mailloux v. Tofino (District)*, 2018 BCSC 2298 at para. 11. See also: *Adelberg* at para. 54.

²¹ Amended claim at para. 96. See: *Lewis v. Alberta Health Services*, 2022 ABCA 359 at paras. 64-68.

²² Amended claim at para. 96, 100. See: s. 92(13), *Constitution Act, 1867*.

²³ Amended claim at para. 97.

²⁴ Amended claim at para. 96. See: *Weisenburger* at paras. 88-89.

vires provincial jurisdiction, as matters falling exclusive within federal jurisdiction;²⁵

- vi. that regulations requiring proof of vaccination to enter public spaces during a pandemic constitute non-consensual medical treatment and violate s. 7 of the *Charter*,²⁶ and
 - vii. Action4Canada claims damages for purported violations of ss. 2(a), 6-7 and 15.²⁷ However, these *Charter* provisions do not apply to non-natural persons or corporations.²⁸ Moreover, and in any event, Action4Canada does not have public interest standing to advance such claims on behalf of any non-parties.
- e. The claims alleged by the plaintiffs, Jane Doe and Valerie Ann Foley,²⁹ are not actionable against British Columbia. These claims relate entirely to the alleged actions of the defendant, TransLink and/or a non-party, St. Paul's Hospital.

19. Second, the amended claim fails to plead a concise statement of material facts necessary to support any complete cause of action. The *Charter* claims are inextricably bound up in a prolix, argumentative, speculative, and evidence-laden narrative that is incapable of supporting a viable cause of action. The same is true for any claims on federalism grounds. It is impossible to separate the material from the immaterial or conjecture and conspiracy from asserted facts. Examples include:

- a. At paras. 26-95, the amended claim sets out a conspiratorial narrative which seeks to impugn the entirety of British Columbia and Canada's response to COVID-19 pandemic. This includes:
 - i. inflammatory and speculative assertions with no basis in reality;³⁰
 - ii. unsupported conclusions of law;³¹ and
 - iii. evidence.³²

²⁵ Amended claim at paras. 97-98. See: *Klassen v. British Columbia (Attorney General)*, 2021 BCSC 2254 at paras. 54-58.

²⁶ Amended claim at paras. 96, 101-103, 107, 110. See: *Weisenburger* at para. 89; *Dorceus* at paras. 96-130.

²⁷ Amended claim at para. 118.

²⁸ *Irvin Toy Ltd. v. Quebec (Attorney General)*, [1989] 1 S.C.R. 927 at 1004; *O'Donnell v. Alberta (Minister of Justice)*, 2024 ABKB 268 at para. 14; *Nova-BioRubber Green Technologies Inc. v. Canada (National Research Council)*, 2024 BCSC 1501 at para. 50.

²⁹ Amended claim at paras. 2, 4, 118(b), (c).

³⁰ Amended claim at paras. 29-30, 42, 49-50, 57-58, 61, 64, 65-69, 71, 74, 85-86, 94.

³¹ Amended claim at paras. 35, 54, 62, 64, 93.

- b. The plaintiffs seek declarations that various unspecified "measures" or "orders" broadly violate the *Charter*.³³ Similarly, the plaintiffs seek declarations that unspecified individuals or state actors violated various constitutional rights.³⁴ It is impossible for the defendants to understand who these allegations are against and what they are about.³⁵
- c. The plaintiffs seek bare declarations of law which are not supported by any material facts or are wholly detached from any specific plaintiffs' circumstances.³⁶

20. Third, the plaintiffs seek declarations on non-justiciable questions of science, international law, or criminal law, including but not limited to:

- a. that *Bill 36 – Health Professions and Occupation Act* "[b]reach[es] parallel international treaty right to no medical treatment without informed consent";³⁷
- b. "that administrating medical treatment without informed consent constitutes experimental medical treatment and is contrary to the *Nuremberg Code* and *Helsinki Declaration* of 1960";³⁸
- c. "that the mandatory masking of children violates... the Convention on the rights of the Child";³⁹ and
- d. "that failure and/or refusal to comply with Provincial COVID-19 Measures does not constitute a 'common nuisance' contrary to s. 180 of the *Criminal Code* or constitute 'obstruct peace officer' contrary to s. 129 of the *Criminal Code*".⁴⁰
- e. That the unspecified provincial measures caused more deaths "at a ratio of deaths well above every death purportedly attributed to COVID-19."⁴¹

21. In addition, the plaintiff Randy Beatty seeks damages for an alleged, unspecified breach of s. 176 of the *Criminal Code*.⁴² This is an improper pleading

³² Amended claim at paras. 37-38, 41, 43, 45-48, 51-52, 55-56, 63, 64, 70, 73, 75, 76-84, 89-94.

³³ Amended claim at paras. 97, 99-100, 103-104, 106-107, 109, 110, 113, 114, 117.

³⁴ Amended claim at paras. 100-103, 106-111, 113, 114-115, 117.

³⁵ *Dorceus* at paras. 55-56.

³⁶ Amended claim at paras. 97-117.

³⁷ Amended claim at para. 96(a)(v).

³⁸ Amended claim at para. 101. See, in particular, *Action4Canada SC* at para. 52(d).

³⁹ Amended claim at para. 115.

⁴⁰ Amended claim at para. 117(d).

⁴¹ Amended claim at para. 100.

⁴² Amended claim at para. 118.

in a civil action.⁴³

22. Fourth, the plaintiffs allege causes of action not known to law, asserting that various government measures violate “unwritten constitutional principles”, “the English Bill of Rights”, and the “Pre-Amble of the Constitution Act, 1867”.⁴⁴

23. The amended claim therefore fails to set out a reasonable cause of action and is bound to fail. It must be struck under Rule 9-5(1)(a).

(b) Amended claim is scandalous, embarrassing, and frivolous (9-5(1)(b))

24. As stated in *Action4Canada SC*, a pleading is scandalous and embarrassing where it is “prolix, contain[s] argument, or fail[s] to state the real issue in an intelligible way”.⁴⁵ This description applies with equal force to the amended claim:

- a. While shorter than the original 391-page pleading, the amended claim remains prolix. Indeed, in *Dorceus* and *Adelberg*, the courts struck claims of nearly identical length for their prolixity.
- b. As in the original claim, the amended claim is rife with unspecified allegations of illegality which are not directed at any particular defendant or supported by any material facts (*i.e.*, bare declarations regarding unspecified “orders” or “measures” impugning the conduct of unnamed government actors).⁴⁶ Such indiscernible claims are indicative of a frivolous and vexatious claim.⁴⁷
- c. Despite being expressly cautioned against doing so by both Justice A. Ross and the Court of Appeal, the amended claim advances non-justiciable claims relating to international law, criminal law, and seeks declarations of fact and science.
- d. The plaintiffs attempt to improperly add a new plaintiff (*i.e.*, Ms. Wilson) and defendant (*i.e.*, Premier Eby).

25. The amended claim is also a scandalous and embarrassing pleading because it fails to meet the basic requirements under the *Rules*:

- a. the amended claim fails to set out a concise statement of the material facts, relief sought, and legal basis, in violation of Rules 3-1(1)-(3);

⁴³ *Action4Canada SC* at paras. 52-53.

⁴⁴ Amended claim at paras. 100(a), 104-105, 107, 109-110, 113.

⁴⁵ *Action4Canada SC* at para. 34(a).

⁴⁶ Amended claim at paras. 97, 99-100, 103-104, 106-107, 109, 110, 113, 114, 117

⁴⁷ *Dorceus* at paras. 55-56.

- b. the amended claim pleads evidence, in contravention of Rule 3-7(1);⁴⁸ and
- c. the amended claim pleads conclusions of law, unsupported by facts, in contravention of Rule 3-7(9).⁴⁹

26. Furthermore, the amended claim is frivolous because it is “without substance, is groundless, fanciful, [and] trifles with the court or wastes time”.⁵⁰ For the reasons set out in detail above, the amended claim is groundless and wholly without substance. Moreover, the amended claim trifles with the court's time by promoting baseless conspiracy theories through unintelligible pleadings, as confirmed by this Court, the Court of Appeal, the Ontario Superior Court of Justice, the Federal Court, and the Federal Court of Appeal.

(c) Amended claim is vexatious and an abuse of process (9-5(1)(d))

27. Courts retain wide discretion to dismiss claims as an abuse of process. It is a flexible doctrine “directed to prevent actions that violate such principles as judicial economy, consistency, finality and the integrity of the administration of justice”.⁵¹ In determining whether a claim is an abuse of process, the Court is entitled to consider “whether there have been multiple or successive related proceedings that are likely to cause vexation or oppression”.⁵²

28. The amended claim is an abuse of process. Despite being given “fair warning” by this Court and the Court of Appeal that advancing similar frivolous claims in their amended pleading may constitute an abuse of process, the plaintiffs have persisted in doing exactly that. This abusiveness is amplified by the fact that since the original claim was struck, the Ontario Superior Court of Justice and Federal trial and appellate courts struck similar pleadings filed by the same counsel. Indeed, many of the same allegations dismissed in the other actions—as well as the original notice of civil claim—are pleaded here, including:

- a. extended recitations of “facts”, wholly consisting of conspiracy theories about the efficacy of vaccination;⁵³
- b. allegations that “mandatory” vaccination violates ss. 2, 7, and 15 of the *Charter* and constitutes “medical experimentation”, and which violate

⁴⁸ Amended claim at paras. 37-38, 41, 43, 45-48, 51-52, 55-56, 63, 64, 70, 73, 75, 76-84, 89-94.

⁴⁹ Amended claim at paras. 35, 54, 62, 64, 93.

⁵⁰ *Steritt v. Canada (Her Majesty the Queen)*, 2017 BCSC 1064 at para. 9.

⁵¹ *Steritt* at para. 11.

⁵² *Steritt* at para. 12.

⁵³ Amended claim at paras. 38-53. See also: Affidavit #1 of Jordan Hamilton, filed September 26, 2025 (“**Hamilton Affidavit**”), Ex. A (*Adelberg* statement of claim at paras. 35-51) and Ex. B (*Dorceus* amended statement of claim at paras. 33-49).

the *Nuremburg Code* and *Helsinki Declaration*;⁵⁴

- c. assertions that there is a “duty to consult” prior to enacting any public health measures;⁵⁵
- d. assertions that provincial emergency legislation is *ultra vires* and that any declarations made thereunder were unlawful;⁵⁶ and
- e. assertions that unspecified “vaccine passports” violate ss. 2, 6, 7, and 15 of the *Charter*.⁵⁷

29. After successive substantially similar frivolous claims were dismissed by five different courts, it ought to have been clear to the plaintiffs that repackaging the same claims in an amended pleading would amount to an abuse of process. Nonetheless, the plaintiffs have chosen to ignore these clear signals from the courts and instead produced yet another unanswerable pleading. This is an improper use of the court’s resources and constitutes an abuse of process.

II. No leave to amend

30. The plaintiffs should not be granted leave to amend for three reasons.

- a. First, the amended claim contains numerous claims which are bound to fail and cannot be remedied via amendment, as outlined above.
- b. Second, the plaintiffs have already been given an opportunity to amend their pleadings and fix the defects identified by Justice A. Ross. The plaintiffs have failed to heed Justice A. Ross’s advice and provided an inscrutable claim which violates the basic tenets of pleading. Providing another opportunity to amend their pleadings would serve no purpose other than delaying the inevitable and increasing costs.⁵⁸
- c. Third, the amended claim is an abuse of process. This is a factor which militates against granting leave to amend.⁵⁹

⁵⁴ Amended claim at paras. 96, 101, 107; original claim at para. 269, 291-292; Hamilton Affidavit at Ex. A (*Adelberg* statement of claim at paras. 1(a)(iv)-(v), 47) and Ex. B (*Dorceus* amended statement of claim at paras. 1(a)(i)-(ii), 45).

⁵⁵ Amended claim at para. 97; original claim at para. 285, 327; Hamilton Affidavit at Ex. B (*Dorceus* amended statement of claim at para. 1(e)(ii)).

⁵⁶ Amended claim at paras. 97-98; original claim at paras. 328, 331; Hamilton Affidavit at Ex. B (*Dorceus* amended statement of claim at paras. 1(e)(i), (iii), (iv)).

⁵⁷ Amended claim at para. 107; original claim at paras. 299, 305, 339; Hamilton Affidavit at Ex. A (*Adelberg* statement of claim at para. 1(e)) and Ex. B (*Dorceus* amended statement of claim at para. 1(h), (j)).

⁵⁸ *H.M.B. Holdings Ltd. v. Replay Resorts Inc.*, 2019 BCSC 1138 at para. 72.

⁵⁹ *E.B. v. British Columbia (Child, Family and Community Services)*, 2021 BCCA 47 at para. 35.

III. Costs

31. British Columbia seeks \$2,500 in costs payable forthwith, pursuant to Rule 14-1(1)(d) and (15). Lump sum costs are an expedient means of avoiding further submissions and litigation.⁶⁰

Part 4: MATERIAL TO BE RELIED ON

32. The pleadings and other materials filed herein.

33. Hamilton Affidavit.

34. Such other materials as counsel may advise and this Honourable Court permits.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to the application, you must, within 5 business days after service of this notice of application or, if this application is brought under Rule 9-7, within 8 business days after service of this notice of application,

- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
 - (i) you intend to refer to at the hearing of this application, and
 - (ii) has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
 - (i) a copy of the filed application response;
 - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on the person,
 - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7 (9).

Date: September 26, 2025



Counsel for British Columbia
Rory Shaw

⁶⁰ *Mousa v. The Institute of Electrical and Electronics Engineers, Incorporated*, 2014 BCCA 415 at para. 34.

To be completed by the court only:

Order made

☐ in the terms requested in paragraphs of Part 1 of
this notice of application

☐ with the following variations and additional terms:

.....

.....

.....

Date:[dd/mm/yyyy].....

.....
Signature of ☐ Judge ☐ Associate Judge

Appendix

THIS APPLICATION INVOLVES THE FOLLOWING:

- ☐ discovery: comply with demand for documents
- ☐ discovery: production of additional documents
- ☐ other matters concerning document discovery
- ☐ extend oral discovery
- ☐ other matter concerning oral discovery
- ☐ amend pleadings
- ☐ add/change parties
- ☐ summary judgment
- ☐ summary trial
- ☐ service
- ☐ mediation
- ☐ adjournments
- ☐ proceedings at trial
- ☐ case plan orders: amend
- ☐ case plan orders: other
- ☐ experts
- ☒ none of the above